

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH

Case No.: 9:22-CV-80660-RAR

UNITED STATES OF AMERICA;

Plaintiff,

v.

PAUL J. MANAFORT, JR,

Defendant.

**DEFENDANT'S UNOPPOSED FIRST MOTION FOR EXTENSION OF
TIME TO RESPOND TO THE GOVERNMENT'S COMPLAINT**

Defendant, through this unopposed Motion, respectfully requests the Court extend his time to Respond to the Complaint by thirty days. As good cause for the requested extension, Defendant states as follows:

1. The Motion is unopposed. This is the first extension of Defendant's response deadline that Defendant has sought in this case.
2. Defendant's response to the Complaint is presently due on June 27, 2022.
2. The Parties are engaged in settlement discussions that both sides reasonably hope will resolve this case. As part of these settlement discussions, information is being gathered and exchanged by the Parties.
3. More time is required for this information exchange to take place. Forcing the Parties to litigate a motion to dismiss or other threshold motions in the meantime will distract from and be detrimental to these efforts.

WHEREFORE, Defendant respectfully requests that this Court extend his deadline to respond to the complaint by thirty days, until **July 27, 2022**.

LOCAL RULE 7.1(a)(3) CONFERRAL

The undersigned has conferred with counsel for the Government and the Government does not oppose this motion or the relief it requests.

Dated: June 24, 2022

Respectfully submitted,

**MARCUS NEIMAN RASHBAUM
& PINEIRO LLP**

/s/ Derick R. Vollrath

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Counsel for Plaintiffs

CERTIFICATE OF SERVICE

I certify that on June 24, 2022, I filed the foregoing document through the Court's CM/ECF system which has caused service to be made upon all counsel of record in this case.

/s/ Derick Vollrath